

ZUCKERMAN
SPAEDER

October 31, 2025

VIA ECF

The Honorable James K. Bredar
U.S. District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Elfenbein*, Crim. No. 22-00146 (JKB)

Dear Judge Bredar:

Trial in the above matter is presently scheduled to begin on March 30, 2026. The purpose of this letter is to request a continuance of the trial date until a date after April 20, 2026.

The government and the defendant have worked diligently and cooperatively to begin preparing the case for trial on the scheduled trial date; however, counsel on both sides have recently learned of scheduling issues with some of their respective experts, necessitating this request. Recognizing the Court's other commitment beginning on June 1, the parties are available for a 3-week trial between April 20 and May 29 with corresponding extensions of the current pretrial deadlines. If the Court deems it necessary, counsel are available for a status conference.

Thank you for your consideration.

Very truly yours,

/s/ Gregg L. Bernstein

Gregg L. Bernstein

Encl.

cc: D. Keith Clouser, Trial Attorney, USDOJ
Matthew Phelps, AUSA